

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
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In Reply To:
6840 (932) P

October 9, 2002

EMS TRANSMISSION:
Instruction Memorandum No. AZ-2003-002
Expires: 9/30/2003

To: Field Supervisor, Arizona Ecological Services Field Office,
2321 W. Royal Palm Road, Suite 103, Phoenix, AZ 85021-4951

From: State Director

Subject: Comments on Proposed Rule to List the Gila Chub as a Federally Endangered
Species with Critical Habitat

The proposed rule to list the Gila Chub (*Gila intermedia*) as endangered with critical habitat was published in the *Federal Register* on August 9, 2002. These are our comments on the proposed rule. Generally, we are in accord with the proposed rule with proposed critical habitat designations. Our comments are specific to errors of fact found in the proposed rule.

Page 51949, middle column, first paragraph, third sentence: From this sentence, it appears that the San Simon River is a perennial water source, when, in fact, it is an ephemeral stream, flowing only after infrequent rainfall events.

Page 51950, middle column, third line from the bottom: Prescribed burning is very unlikely to be an adverse impact to the Gila Chub and likely would have beneficial impacts by improving the watershed. Prescribed burning is subject to a host of environmental and physical constraints and achieves specific resource objectives. Indiscriminant burning of sacaton bottomlands adjacent to streams may have been a past impact, but the term "prescribed burning" is not an accurate description of such actions. We suggest either deleting the term "prescribed burning" or inserting a more accurate term.

Page 51951, first column, second paragraph, first sentence: The amount of water that the City of Safford is allowed to divert is five cubic feet per second, not 4000.

Page 51951, third column, first paragraph, first sentence: Roads in Bonita Creek traverse it about eight times, not "more than 30 times."

Page 51951, third column, second paragraph, third sentence: There are five remaining native species. The razorback sucker has not become re-established.

Page 51951, third column, third paragraph, first sentence: The razorback sucker has not been found in Bonita Creek for the past 10 years, despite surveys.

Page 51959, first column, last paragraph: Bonita Creek should be included in this area within Graham County.

Page 51960, second column, second paragraph: Blue River and Bonita Creek are not in Gila or Maricopa Counties. They are in Greenlee and Graham Counties, respectively.

As you know, BLM has participated in conservation of this species through reintroductions in the Agua Fria River drainage, improvement of the riparian areas of Cienega Creek and Bonita Creek, and other actions. We appreciate the opportunity to comment on this proposed rule and look forward to furthering our ongoing conservation efforts for this species. If you have any questions, please contact Ted Cordery, our endangered species coordinator, at 602-417-9242.

SIGNED BY:
Lonna M. O'Neal
Acting State Director

AUTHENTICATED BY:
Melissa Gishie
Staff Assistant

cc: State Director, New Mexico
Field Managers, Phoenix, Safford, Tucson
WO-230, Attn: Peggy Olwell